

At a glance: NIH conflicts-of-interest revisions

Topic	1995 HHS “Objectivity in Research” regulations	HHS revisions for 2012
Minimum financial interest threshold that requires disclosure	\$10,000 in payments and/or equity interests.	Lowered to \$5,000 in total payments and equity for each company, foundation or medical society.
What to disclose to an institution	Only interests deemed relevant by the investigator.	All significant conflicts of interest related to an investigator’s institutional responsibilities, including certain intellectual property rights and authorship fees.
Disclosures of sponsored travel	Not mentioned.	Must disclose all reimbursed travel related to institutional responsibilities, except travel sponsored by academic or government institutions.
Financial conflicts of interest that must be reported by the institution to the NIH	None, but must specify whether the interest is managed, reduced or limited.	Must report the value of financial conflicts of interest in preset dollar ranges at the time of grant application, prior to expenditure of NIH funds, on an annual basis and if new financial conflicts of interest are acquired.
Public accessibility of financial interests	No requirement.	New financial conflicts of interest must be posted to an institution’s website within 30 days or mailed to a requestor within five business days. Records and mitigation plans must be made available for three years.
Conflict-of-interest training	No requirement.	Must complete training prior to engaging in NIH research, at least every four years and under other circumstances.
Institutional reviews and conflict mitigation	Not mentioned.	University must conduct reviews of suspected non-compliance to rules, but is only required to notify NIH of cases where bias is found, including a list of financial conflicts and a management plan.

<http://med.stanford.edu/ism/2011/october/5q-greenberg-1024.html>